

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:06-cr-58-WKW
)	
SHAMONDA L. MUSHAT)	

GOVERNMENT'S MOTION FOR DOWNWARD DEPARTURE

COMES NOW the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and Kent B. Brunson, Assistant United States Attorney for the Middle District of Alabama, and pursuant to United States Sentencing Guideline Section 5K1.1 moves for a one (1) level downward departure in Ms. Mushat's total offense level. This request is based upon the following:

- 1) Since her arrest in this case, Ms. Mushat has cooperated fully with federal law enforcement officials. Specifically, Ms. Mushat has provided law enforcement officials with detailed information concerning an ongoing investigation relating to mail fraud and fraudulent check activities within the State of Alabama.
- 2) As a result of Ms. Mushat's timely plea of guilty and the usefulness of her truthful and significant assistance to law enforcement personnel, significant progress has been made in the investigation and prosecution of illegal activity within Alabama and the government has been able to utilize its resources effectively.

WHEREFORE, for all the reasons set forth above and pursuant to U.S.S.G. § 5K1.1, the government is satisfied the defendant is entitled to a one (1) level reduction in her total offense level.

Respectfully submitted this the 5th day of October, 2006.

LEURA GARRETT CANARY
UNITED STATES ATTORNEY

/s/ Kent B. Brunson
KENT B. BRUNSON
Assistant United States Attorney
Bar Number: ASB-3094-U62K
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
E-mail: kent.brunson@usdoj.gov

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CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Sydney Albert Smith.

Respectfully submitted,
LEURA GARRETT CANARY
UNITED STATES ATTORNEY

/s/ Kent B. Brunson
KENT B. BRUNSON
Assistant United States Attorney
Bar Number: ASB-3094-U62K
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
E-mail: kent.brunson@usdoj.gov